

# **EXHIBIT A**

PLAINTIFF J.D.'S PROPOSED JUDICIAL VOIR DIRE

1. Have you or anyone close to you ever owned a business where you had employees? If Yes, was the business ever sued or were there any claims made against the business or the employees?
2. Do you have any concerns or negative views about holding a ride share company legally and financially responsible for the actions of their drivers?
3. This is a civil lawsuit, not a criminal case. The driver of the Uber who is alleged to have assaulted the plaintiff is not a party to the lawsuit, Uber is the only defendant. Knowing this, has anyone already decided they are not able to be an impartial juror in this case?
4. Has anyone already formed the opinion that this should be a criminal matter involving the driver and that Uber should not be involved in any way?
5. Have you read, seen, or heard any media coverage or advertisements about Uber's Safety Features or safety initiatives?
6. Have you or anyone close to you ever utilized any of Uber's Safety Features while on a ride?
7. Do you have any strong beliefs against cameras in rideshare vehicles or taxis?
8. Do you believe concerns about privacy outweigh the benefits of surveillance cameras?
9. If you or anyone close to you has ever driven passengers for a living, have you / the person close to you ever been falsely accused of inappropriate conduct, including sexual harassment, sexual comments / flirting, or sexual assault?
10. Have you ever known about someone who you believe made a claim of molestation, sexual assault, or sexual misconduct that you thought was false or exaggerated?
11. Do you have any personal, moral, religious or other beliefs against the consumption of alcohol?
12. Do you believe that women who choose to drink alcohol are more sexually promiscuous?
13. Do you have any personal, moral, religious or other beliefs about premarital sex?
14. Do you believe that if a woman was drinking alcohol or was drunk when she claims she has been sexually assaulted she should be seen as less credible?

15. Would you have a hard time believing a woman who claimed she was sexually assaulted if she was drunk at the time?
16. Do you start out believing that if a woman who has been drinking alcohol or is intoxicated gets sexually assaulted she must share at least some of the responsibility for what happened to her?
17. Do you believe that if a woman does not physically resist sexual advances or fight back then she cannot have been sexually assaulted?
18. Do you believe that if a woman has made more than one allegation of rape or sexual assault she should not be believed or is less credible?
19. Do you believe that a lot of times, women who claim they were sexually assaulted really just have emotional problems?
20. There may be law enforcement testimony in this trial. Do you have any views about law enforcement that would cause you to give more weight and credibility to the testimony of a law enforcement officer than you would to other witnesses who are not in law enforcement?
21. Do you know anyone who has the mental health condition Borderline Personality Disorder or do you have any knowledge, training, or experience with this condition?
22. Have you ever worked for a company or organization that you believe was sued unfairly?
23. There has been a lot of media coverage about large jury awards, personal injury lawyers, frivolous lawsuits and so on. Do any of you have opinions about these topics?
24. Do you start out believing that most lawsuits where people are seeking monetary compensation are frivolous?
25. Do you have any negative opinions about or have you ever had a negative experience with personal injury lawyers?
26. Do you hold the belief that most people who file lawsuits are simply targeting “deep pockets” as opposed to having legitimate claims?
27. Have you read, seen, or heard anything on social media or in other sources about lawyers who are filing lawsuits against Uber? If Yes, do you have any negative views about these lawyers or lawsuits?

28. Do you start out thinking that most lawsuits against ride share companies are motivated by money?
29. Do you have any negative views about awarding someone monetary compensation in personal injury lawsuit for things like pain, discomfort, suffering, anxiety and loss of enjoyment of life?
30. Do you have an upper limit or cap on the amount of money you would be willing to award in a lawsuit for someone's pain, discomfort, suffering, anxiety and loss of enjoyment of life no matter what the evidence shows?
31. Punitive damages can be awarded against a defendant company in order to punish past misconduct and to deter future misconduct. Do you have any negative opinions or beliefs against awarding punitive damages in a civil lawsuit?
32. While outside of this courtroom, in your everyday life many of you may disagree that individuals and corporations should be treated the same. Many of you might say you tend to root for the underdog or choose David over Goliath. But in this courtroom, under the law, there is no distinction between corporations and individuals. Under the law corporations are treated the same as individuals. Does everyone here agree that they will follow the law this law, even if you might not agree with it?